

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WILLIAM IRVING,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-CV-10054 EFH
)	
7-ELEVEN, INC. and)	
THE SOUTHLAND CORPORATION)	
)	
Defendants.)	
)	

JOINT STATEMENT BY PARTIES

Pursuant to Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, the parties in the above-entitled matter propose the following pre-trial schedule:

PHASE 1 – DISCOVERY

Service of requests for production of documents	02/17/06
Service of interrogatories	03/17/06
Responses to all written discovery	04/14/06

PHASE 2 – DISCOVERY

Completion of fact depositions (15 per side – not to include keeper of record depositions or depositions by written questions)	08/01/06
Plaintiff's disclosure expert witness reports	09/12/06
Defendants' disclosure expert witness reports	11/01/06

Completion of expert depositions 01/12/07

PHASE 3 – PRETRIAL AND TRIAL

Filing of summary judgment motions 03/02/07

Filing responses to summary judgment 04/06/07

Final pre-trial conference 05/07/07

Trial 06/04/07

The parties do not agree, at this time, to a trial by Magistrate Judge.

Plaintiff,
WILLIAM IRVING
By his attorneys,

Defendants,
7-ELEVEN, INC. and
THE SOUTHLAND CORPORATION,
By their attorneys,

/s/ Carmen L. Durso _____
Carmen L. Durso
BBO No. 139340
100 Summer Street
Suite 3232
Boston, MA 02110
(617) 728-9123

/s/ Janet B. Pezzulich _____
Michael P. Giunta
BBO No. 543768
Janet B. Pezzulich
BBO No. 642442
DONOVAN HATEM LLP
Two Seaport Lane
Boston, MA 02210
617-406-4500

Date: November 30, 2005

00926595
24488.2